

Parcel C Explanation of Significant Differences

Hunters Point Naval Shipyard
BCT Meeting

March 27, 2014

Parcel C ESD: Presentation Outline



- **Description of Types of Changes**
- **Basis for ESD**
- **Subject Excavations as presented in ESD**
- **Schedule**

Description of Types of Changes



Per NCP Section 300.435(c)(2) and USEPA Guidance, post-ROD changes may be categorized as non-significant (or minor), significant, or fundamental based on the nature of change with respect to SCOPE, PERFORMANCE, AND/OR COST.

- **Non-significant changes** involve minor changes arising during design and construction and when modifications are made to the functional specifications of the remedy to address issues such as performance optimization or cost minimization.
 - **Memorandum to the Administrative Record File**
- **Significant changes** involve changes to components of the remedy but do not fundamentally alter the selected remedy.
 - **Explanation of Significant Differences**
- **Fundamental changes** involve appreciable changes in scope, performance, and/or cost of the selected remedy.
 - **ROD Amendment**

- **Re-evaluation of soil excavations under Selected Remedy (S-5)**

- Implementation of “tiered action levels” for excavation of select COCs (metals excluding mercury and PCBs).
- Tiered action levels are based on RGs (either 5 times or 10 times).
- Screening level human-health risk assessment (HHRA) was performed using the tiered action levels and showed the change does not result in risk outside the risk management range [i.e., 1E-4 to 1E-6].
- Changes were discussed at a Triad Meeting on December 4, 2013 and outlined in Appendix G of Parcel C RD (Tech Memo, Shaw 2013).

- **Tiered Action Level approach is considered a Significant Change**

- **Scope:** Total excavation area and volume is reducing from original 42,000 yd³ to 22,289 yd³. However, the type of treatment is not changing.
- **Performance:** RGs and RAOs associated with S-5 are not changing nor does the change alter the need for excavation, soil cover, SVE, or ICs.
- **Cost:** The cost will be reduced by approximately - 30%.

Subject Excavations as presented in ESD



- The following excavation boundaries have changed based on the “tiered action level” approach and are considered **significant**:
 - RU-C1: Excavation 22-2;
 - RU-C4: Excavations 23-1, 24-3, and 24-5; and
 - RU-C5: Excavation 11-2.
- Excavations 10-3, 10-4, 11-1, 18-2, 18-4, 24-2, 24-4, and 26-2 were revised to extend 1 foot vertically from the known extent of contamination vice the 10 feet bgs as described in the ROD. This is being documented as a **non-significant (minor)** change in the ESD.

Please Note: Additional excavations are identified in the Parcel C RD Appendix G, Tech Memo and are identified for “no further action” based on previous removal actions and not due to implementation of tiered action levels.

Schedule for ESD



Draft ESD to BCT	April 4
BCT Comments to Navy	May 5
Respond to BCT Comments	May 19
Final ESD	June 11